

*Certified Mail*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

(Write the District and Division, if any, of  
the court in which the complaint is filed.)

**FILED**

**JAN 25 2022**

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
AKRON

KENNETH WHITE

(Write the full name of each plaintiff who is filing  
this complaint. If the names of all the plaintiffs  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

-against-

BARRINGTON GOLF CLUB

DIANE FORD

MONTE AHUTA

(Write the full name of each defendant who is  
being sued. If the names of all the defendants  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

Complaint for a Civil Case

Case No. **5 : 22 CV 00130**  
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No  
(check one)

**JUDGE LIOI**

**MAG JUDGE KNAPP**



**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name KENNETH WHITE 36473-060  
 Street Address PO Box 8000 @FCI MCKEAN  
 City and County BRADFORD, MCKEAN  
 State and Zip Code PA 16701  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name BARRINGTON GOLF CLUB  
 Job or Title \_\_\_\_\_  
 (if known) \_\_\_\_\_  
 Street Address 350 N. AURORA RD  
 City and County AURORA PORTAGE  
 State and Zip Code OHIO 44202  
 Telephone Number (330) 995-0600  
 E-mail Address dford@BARRINGTONGOLF.ORG  
 (if known) \_\_\_\_\_

**Defendant No. 2**

Name DIANE FORD  
 Job or Title MEMBERSHIP DIRECTOR  
 (if known) \_\_\_\_\_  
 Street Address 350 N. AURORA RD  
 City and County AURORA PORTAGE



State and Zip Code OHIO 44202  
Telephone Number (330) 995-0600 ext. 2140  
E-mail Address dford@Barringtongottlieb.org  
(if known)

Defendant No. 3

Name MONTA AHUJA  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address 350 N. AURORA RD.  
City and County AURORA PORTAGE  
State and Zip Code OHIO 44202  
Telephone Number (330) 995-0600  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.



What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

BREACH IN CONTRACT USL 1706.05

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_.

b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.



b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

(PLAINTIFF) KENNETH WHITE, (DEFENDANT) = BARRINGTON GOLF CLUB, DIANE FORD AND MONTE AHOTA ALL DID CONSPIRE TO MISREPRESENT AND MISUSE THE PLAINTIFFS EQUITY MEMBERSHIP INVESTMENT. THE ORIGINAL INVESTMENT BY MR. WHITE WAS \$50,000.00 AND HAS MATURED TO \$200,000.00. THE DEFENDANTS HAVE TAKEN MR. WHITES EQUITY MEMBERSHIP MONIES, AND REFUSE TO PAY MR. WHITE ANY OF HIS EQUITY SHARE AS WELL AS THE DEFENDANTS REFUSE TO PROVIDE ANY PROOF OF SHARE WHEREABOUTS.



**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

RELIEF REQUESTED IS FOR THE DEFENDANTS TO RETURN MR. WHITE'S ORIGINAL INVESTMENT OF EQUITY MEMBERSHIP SHARE IN THE AMOUNT OF \$50,000.00 PLUS INTEREST INCURRED OVER THE PAST 16 YEARS. THE TOTAL AMOUNT REQUESTED IS (\$200,000.00) WHICH INCLUDES A MODEST RETURN ON INVESTMENT AND ALL COSTS IN THIS SUIT and any other legal fees.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1/15, 2022

Signature of Plaintiff

Printed Name of Plaintiff

  
Kenneth White

**B. For Attorneys**

Date of signing: 1/15, 2022



Signature of Attorney

PROSE

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

PO Box 8000 FEL McKEN

Telephone Number

BRADFORD, PA 16701

E-mail Address